

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
OHIO WESTERN DIVISION

2016 JAN 29 PM 4:15
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

Clear Knights Ltd.
Ariel Grant
Will N Seal Estates
Shaung Admissions

-against-

JOHN JAMES DYER III D.B.A
REIMER, ARNOVITZ, CHERNEK &
JEFFREY CO, L.P.A.,
NOVA TITLE AGENCY INC.,
AMELIA A. BOWER D.B.A
PLUNKETT COONEY

Complaint for a Civil Case

3:16 CV 222

Case No. _____

No Jury Trial

I. The Parties

A. Plaintiffs

No. 1

CLEAR KNIGHTS LTD.

No. 2

ARIEL GRANT

No. 3

WILL N SEAL ESTATES

No. 4

SHAUNG ADMISSIONS

C/O WESTMAR COURT #242
TOLEDO, LUCAS COUNTY
OHIO 43615

B. Defendants

No. 1

JOHN JAMES DYER III (0062358)
REIMER ARNOVITZ CHERNER & JEFFREY CO, LP
30455 SOLON RD
SOLON, CUYAHOGA COUNTY
OHIO 44139
440-600-5500
info@reimerlaw.com

No. 2

NOVA TITLE AGENCY INC.
30455 SOLON RD
SOLON, CUYAHOGA COUNTY
OHIO 44139
440-600-5500
jdyer@novatitleagency.com

300 EAST BROAD ST STE 590
COLUMBUS, FRANKLIN COUNTY
OHIO 43215
614- 629- 3004
614- 629- 3019 Fax
abower@plunkettcooney.com

II. Basis for Jurisdiction

Federal Question: **28 United States Code, Section 1331**. Civil actions also arise under; **28 U.S. Code § 1338(b)**, **28 U.S. Code § 1343(a)**.

Federal Question Issues

Equal Protection of the **Fourteenth Amendment**; Due Process and use of Private Property with Just Compensation **Fifth Amendment**; Clauses of the United States Constitution.

15 U.S. Code § 1, **15 U.S. Code § 1114**, **18 U.S. Code § 241**, **18 U.S. Code § 1951**, **18 U.S. Code § 1832**, **18 U.S. Code § 1001(a)**, **42 U.S. Code § 1982**, **42 U.S. Code § 1983**, **42 U.S. Code § 1985** and **42 U.S. Code § 3617**.

3. The Amount in Controversy

The amount at stake and fines Defendants owe for residential, intellectual and secured property, civil rights and treble damages accessible pursuant to Anti-Trust and violations exceeds \$75,000.

III. Statement of Claim

P-1 Clear Knights Ltd.

P-2 Ariel Grant

P-3 Will N Seal Estates

**D-1 JOHN DYER III D.B.A REIMER, ARNOVITZ,
CHERNEK & JEFFREY CO., L.P.A.**

D-2 NOVA TITLE AGENCY INC.

D-3 AMELIA A. BOWER D.B.A PLUNKETT COONEY

1. On or about November 24, 2015 and continuing, in the Northern District of Ohio, Western Division, the Defendants, D-1 and D-2 presented or cause to presented false claims for appropriation of property. Further actions sustained involves the following:
2. The Defendants, D-1 and D-2 discriminated against Plaintiffs transactions related to residential real estate.

3. The Defendants, D-1 and D-2 knowing that secured property involved a trust, engage in combination to restrain Plaintiffs, P-1 and P-3 of trade in commerce.
4. The Defendants, D-1 and D-2 conspired to oppress the Plaintiffs of secured rights and privileges.
5. The Defendants, D-1 and D-2 subjected the Plaintiffs to deprivation of secured immunities, rights and privileges.
6. The Defendants, D-1 and D-2 converted by printing and publishing Trust Instrument without notification, authorization or consent of the Plaintiffs, P-1 and P-3.
7. The Defendants, D-1 and D-2 converted trade secrets related to administration services disclosed in the Plaintiffs, P-1 and P-3 registered Trust Certificate for the benefit of another with intent to injure the owner.
8. The Defendants, D-1 and D-2 provided materially false entries in conspiracy to interfere with the Plaintiffs civil rights.
9. On or about December 10, 2015 and continuing, in the Northern District of Ohio, Western Division, the Defendants deposited, causing delivery of communication intending to extort money from the Plaintiffs. Further actions sustained involves the following:
 10. The Defendants deposited causing delivery communication intending to extort property from the Plaintiffs.
 11. The Defendants deposited causing delivery of communication injuring to Plaintiffs reputation.
 12. The Defendants presented or cause to presented false claims for appropriation of property.
 13. The Defendants discriminated against Plaintiffs, transactions related to residential real estate.
 14. The Defendants converted the trade secrets disclosed in Plaintiffs; P-1 and P-3 registered Trust Certificate with intent to injure the owner.
 15. The Defendants willfully provided materially false entries in conspiracy to interfere with civil rights of the Plaintiffs.
 16. The Defendants neglected to prevent conspiring acts depriving rights of Plaintiffs.

17. The Defendants knowing that secured property involved a Trust, engaged in combination to restrain Plaintiffs, P-1 and P-3 of trade in commerce.
18. The Defendants conspired to oppress the Plaintiffs of secured rights and privileges.
19. The Defendants subjected the Plaintiffs to deprivation of secured immunities, rights and privileges.
20. The Defendants converted by printing and publishing Trust Instrument without notification, authorization or consent of the Plaintiffs; P-1 and P-3.
21. The Defendants made fraudulent representations and statements defaming the Plaintiffs.

IV. Relief

1. The Plaintiffs honorably requested that this Court take notice of the highlighted areas in publicly published deeds records and unsubstantial intimidating civil materials "Attachment" attached to this brief.
2. Request that the Court seal the entire complaint, due to the classified information involved in the confidential structure and organization of the Plaintiffs' association, to protect further damages to the national security.
3. The Defendant their officers, agents, clients, attorneys any and all representatives shall be permanently enjoined from any and all further conspiring intimidations, communications, jointly and severally whatsoever, with Plaintiffs their members, agents, clients and successors.
4. Compelling Defendants to provide notice and official statements to correct, remove, terminate and dispose all displays of false libels, certificates and documents printed and publish with the Lucas County Recorder and be permanently enjoined from supplying false, misleading information and inquiries pertaining to the Plaintiffs.
5. The public and private sectors' infrastructure will continue to suffer irreparable harm unless the Defendants are immediately enjoined from their malice disclosure of the Plaintiffs' and their members' private affairs.
6. Award and enforce penalties liable by the Defendants severally for their reckless activities, the following fines and costs to the Plaintiffs,:
 - a. Anti-trust compensatory damages for restraint of trade in real estate purchased for Four hundred Thirty thousand dollars (\$430,000), plus

6. Award and enforce penalties liable by the Defendants severally for their reckless activities, the following fines and costs to the Plaintiffs,:

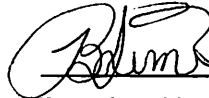
- a. Anti-trust compensatory damages for restraint of trade in real estate purchased for Four hundred Thirty thousand dollars (\$430,000), plus treble damages; total of One million Two hundred Ninety thousand dollars (\$1,290,000).
- b. Infringement fines in the amount of Two million dollars (\$2,000,000), the assessed value of Trust assets and for confidential trade secrets, property identification, etc. disclosed, plus treble damages total of; Six million dollars (\$6,000,000).
- c. Punitive damages and any further relief as the court may deem just and equitable, along with service fees.

V. Certification and Closing

By signing below, we certify that complaint complies with the requirements under Federal Rule of Civil Procedure 11(b).

Date of signing: January 29th, 2016.

Signature of Agent



A.R. Shaung Admissions

Printed Name of Agent

Brandon Sims

Name of Firm

Shaung Admissions

Reg. Number

2361714

Address

2650 Westmar Ct. #242 Toledo, Ohio [43615]

Telephone Number

(419) 984-4322

E-mail Address

Schrisk@yahoo.com